

PAUL HASTINGS

May 8, 2024

VIA ECF

Hon. Sidney H. Stein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Robert Menendez et al.*, S4 23 Cr. 490 (SHS)

Dear Judge Stein,

We respectfully submit this letter on behalf of Senator Robert Menendez to reply to the government's letter this evening opposing our request for a list of all serial numbers the government collected from the cash seized from the Senator's marital home.

We now understand, for the first time, that no broader list of serial numbers has been created by the government—whether by the FBI, the U.S. Attorney's Office, or any member of the prosecution team—beyond the list that the government produced to the Federal Reserve Bank and to defendants. On that understanding, Defendant withdraws his application.

That said, we are obliged to note that our application could have been avoided if the government had informed us at the outset that it does not have a broader list of serial numbers of cash seized from the Senator's marital home, in response to the Senator's inquiries. Instead, the government avoided direct response to our repeated inquiries, insisting that defendants have no right to this information, and that any such serial number inventory would be work product in any event. We genuinely hope that future interactions with the government will avoid such time-consuming and needless motion practice.

Respectfully submitted,

/s/ Adam Fee

Adam Fee
Avi Weitzman